UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In Re PHILIP JENSEN-CARTER, Debtor.	**Hearing Date: May 22, 2017** **Hearing Time: 10:00 AM** Bankruptcy No. 11-22572-RDD Chapter 7

NOTICE OF MOTION TO REOPEN A CLOSED CHAPTER 7 BANKRUPTCY CASE

PLEASE TAKE NOTICE that upon the annexed application of Philip Jensen-Carter (the "Debtor") acting by and through his attorneys, Bronson Law Offices, P.C., a motion will be made on May 22, 2017 at 10:00 a.m. before the Honorable Judge Robert D. Drain, at the U.S. Bankruptcy Court, Southern District of New York, at 300 Quarropas Street, White Plains, New York, pursuant to 11 U.S.C. §§ 105(a), 350(b), and Rule 5010 of the Federal Rules of Bankruptcy seeking to reopen the case.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, shall be served upon and received by undersigned counsel at the address indicated below and filed with the Court together with proof of such service, no later than seven (7) days prior to the return date thereof.

Dated: Harrison, NY
March 17, 2017

BRONSON LAW OFFICES, P.C.

By: /s/ H. Bruce Bronson
H. Bruce Bronson, Esq.
Attorneys for the Debtors
480 Mamaroneck Avenue
Harrison, NY 10528
(877) 385-7793

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
---X
In Re

PHILIP JENSEN-CARTER,

Debtors.
---X

Hearing Date: May 22, 2017
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Bankruptcy No. 11-22572-RDD
Chapter 7

DEBTOR'S MOTION TO RE-OPEN A CLOSED CHAPTER 7 BANKRUPTCY CASE

The debtor, Philip Jensen-Carter (the "Debtor"), acting by and through his attorneys, Bronson Law Offices, P.C., respectfully represent as follows:

1. This is a core proceeding over which this Court has jurisdiction pursuant to 28 U.S.C. §§ 157 and 1334.

2. This is a motion by the Debtor to re-open his chapter 7 case under 11 U.S.C. §350(b) and Bankruptcy Rule 5010; to allow Debtors to add a creditor.

3. Debtor asserts that pursuant to Bankruptcy Rule 5010, no appointment of a trustee is necessary.

4. On August 29, 2011, the Debtor commenced the bankruptcy case by filing a voluntary petition for relief under Chapter 7, Title 11 of the United States Bankruptcy Code (the "Petition"). **Exhibit A.**

5. Debtor attended the mandated Section 341(a) hearing and complied with all requests of the chapter 7 trustee.

6. A total amount of $1,936.83 was paid to non-priority unsecured creditors with aggregate debt of $67,324.61 resulting in a dividend of approximately $0.029**. Exhibit B-Chapter 7 Trustee's Final Account and Distribution Report Certification that the Estate has been Fully Administered and Application to be Discharged**

7. On July 22, 2011, the court entered a discharge order. **Exhibit C- Order of Discharge**

8. On July 13, 2015, the case was closed.

9. In August of 2015, The Debtor was contacted by a Law firm who represented Barbara Harrison.

10. Counsel responded to Harrison's demand. **(Exhibit E)**

11. The Debtor inadvertently did not list Harrison as a creditor on his 2011 petition.

12. Since the demand in August of 2015, Harrison has rejected several settlement offers from the Debtor and has even gone as far as filing a case against him in small claims court in Peekskill, NY. **(Exhibit F)**

13. Pursuant to Section 350(b) of the bankruptcy code, a case may be reopened in the court in which such case was closed to administer assets, to accord relief to the debtor, or for other cause.

14. The Debtor intends to reopen the case to add Harrison as a creditor.

15. The reopening of a case to a add a creditor is a proper reason to reopen a case. *In re Cruz, 254 B.R. 801 (Bankr. S.D.N.Y. 2000), In re: Mohammed, 536 B.R. 351 (Bankr. E.D.N.Y. 2015)*

WHEREFORE, the Debtor respectfully requests that this Court issue an Order

(i) reopening the Debtors' Chapter 7 case pursuant to 11 U.S.C. § 350(b) and Rule 5010 of the Federal Rules of Bankruptcy for a 45-day period;

(ii) closing the case on the 45th day from date of the order reopening the case; and

(iii) for such other relief, as may be deemed just and proper.

Dated: Harrison, NY
March 17, 2017

BRONSON LAW OFFICES, P.C.

By: /s/ *H. Bruce Bronson*_____
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